UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MOBIL CERRO NEGRO, LTD.) Civil Action No.
Plaintiff,))
) AFFIDAVIT IN SUPPORT
v.) OF MOTION TO ADMIT
) MARK A. MORAN
) PRO HAC VICE
PDVSA CERRO NEGRO S.A.)
)
Defendant.)
)

MICHAEL MILLER states as follows:

- 1. I am a member of the Bar of this Court and of the firm of Steptoe & Johnson LLP. I make this affidavit in support of plaintiff Mobil Cerro Negro Ltd.'s motion for the admission of Mark A. Moran, Esq. to practice *pro hac vice* as counsel for Plaintiff in the above-captioned case.
- 2. Mr. Moran is a member of the firm of Steptoe & Johnson LLP, resident in our District of Columbia office. Mr. Moran is a member in good standing of the Bar of the District of Columbia. (A certified copy of Mr. Moran's certificate of good standing in the Bar of the District of Columbia is annexed hereto as Exhibit 1.) Mr. Moran is also an inactive member of the Bar of the State of Michigan. (A certified copy of Mr. Moran's standing as an inactive member of the Bar of the State of Michigan is attached hereto as Exhibit 2.) Mr. Moran has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.
- 3. In addition, I have worked with Mr. Moran and I can personally attest that he is competent and of good character.

- 4. There are no pending disciplinary proceedings against Mr. Moran in any State or Federal Court.
- 5. Wherefore, I respectfully request that Mark A. Moran, Esq., be admitted to practice *pro hac vice* as counsel for plaintiff Mobil Cerro Negro Ltd. in the above-captioned case.
- 6. Pursuant to 28 U.S.C.A. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 27, 2007

New York, New York

Michael Miller

STEPTOE & JOHNSON LLP 750 Seventh Avenue

New York, New York 10019

(212) 506-3900

Attorney for Plaintiff Mobil Cerro Negro, Ltd.

EXHIBIT 1



District of Columbia Court of Appeals Committee on Admissions 500 Indiana Avenue, N.W. — Room 4200 Washington, D. C. 20001 202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MARK A. MORAN

was	on th	ne .	8 TH	_ 	day of	<u>.</u>	JU	LY,	1988					
dul	y qua	lifi	Led	and	admitt	ed	as	an	atto	rney	and	coun	selor	anc
ent:	itled	to	pr	actio	ce befo	ore	thi	is	Court	and	is,	on	the	date
ind	icated	d be	low,	an	active	mem	ber	in	good	stan	ding	of th	nis Ba	ar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 20, 2007.

GARLAND PINKSTON, JR., CLERK

Bv:

Deputy/Clerk

EXHIBIT 2

